

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES OF AMERICA)	
)	
V.)	No. 2:19-CR-196
)	
ADAM WADE BEAR)	

**MOTION OF DEFENDANT ADAM WADE BEAR FOR FURLOUGH OR RELEASE TO
ATTEND FUNERAL OF HIS GRANDMOTHER**

Comes Adam Wade Bear, by and through his counsel, and moves the Court to grant him a furlough or release to attend the funeral for his maternal grandmother, and in support thereof says:

1. Adam Wade Bear's maternal grandmother, Reta Burke, died on July 23, 2020, at 85 years of age.
2. Mr. Bear had a close relationship with his maternal grandmother. She lived in Kingsport. He also resided in Kingsport at the time of his arrest.
3. Counsel has been advised that the funeral will take place at Hamlett-Dobson Funeral Home in Kingsport, Tennessee, at 6:00 p.m. on Saturday, July 25, 2020.

4. Mr. Bear is presently housed in the Carter County Jail.

5. His Mother, Teresa Hicks, has advised counsel that she can pick him up at the Carter County Jail at 1:00 p.m. on July 25, 2020, take him to the visitation and funeral in Kingsport, and return him to the Carter County Jail no later than 9:30 p.m., if he is released on furlough for the purpose of attending the visitation and funeral.

WHEREFORE, for the reasons aforesaid, Adam Wade Bear respectfully moves the Court to order his release or furlough between 1:00 p.m. on Saturday, July 25, 2020 and 9:30 p.m. on Saturday, July 25, 2020, so that he can attend funeral services for his maternal grandmother, Reta Burke, in Kingsport.

/s/Jerry W. Laughlin

JERRY W. LAUGHLIN
(BPR No. 002120)
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Adam Wade Bear

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CERTIFICATE OF SERVICE

I hereby certify that notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other interested parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

This the 23rd day of July, 2020.

/s/Jerry W. Laughlin

Jerry W. Laughlin

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